

United States District Court

for the

Eastern District of Washington

Petition for Warrant or Summons for Offender Under Supervision

Name of Offender: Angel N. Lyons

Case Number: 2:14CR00168-TOR-19

Address of Offender:

Name of Sentencing Judicial Officer: The Honorable Thomas O. Rice, U.S. District Judge

Date of Original Sentence: August 31, 2015

Original Offense: Conspiracy to Commit Bank Fraud, 18 U.S.C. § 1349

Original Sentence: Prison - 5 days
 TSR - 36 months

Type of Supervision: Supervised Release

Asst. U.S. Attorney: George J. C. Jacobs, III Date Supervision Commenced: September 6, 2015

Defense Attorney: Federal Defender's Office Date Supervision Expires: September 5, 2018

PETITIONING THE COURT

To issue a warrant.

The probation officer believes that the offender has violated the following condition(s) of supervision:

<u>Violation Number</u>	<u>Nature of Noncompliance</u>
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Standard Condition # 3: The defendant shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer.

Supporting Evidence: Angel Lyons violated the terms of her supervised release in Spokane, Washington, on or about September 21, 2015.

On September 11, 2015, Ms. Lyons reported to the U.S. Probation Office for her supervision intake, at which time the conditions of her release and supervision were reviewed with her. She reported residing at St. Margaret's Shelter located on East Hartson, in Spokane.

On or about September 21, 2015, Ms. Lyons indicated that she had no change in residence, when she had in fact changed residences on or about September 18, 2015.

2 Standard Condition # 6: The defendant shall notify the probation officer at least ten days prior to any change in residence or employment.

Supporting Evidence: Angel Lyons violated the terms of her supervised release in Spokane, Washington, on or about September 17, 2015.

On or about October 17, 2015, the offender changed her residence and failed to report it to her U.S. probation officer at least ten days prior to the change.

Prob12C

Re: Lyons, Angel N**November 3, 2015****Page 2**

3

Standard Condition # 11: The defendant shall notify the probation officer within seventy-two hours of being arrested or questioned by a law enforcement officer.

Supporting Evidence: Angel Lyons violated the terms of her supervised release in Spokane, Washington, on or about September 18, 2015.

The offender had law enforcement contact on or about September 18, 2015, and failed to report it to her U.S. probation officer within 72 hours.

4

Special Condition # 14: You shall abstain from alcohol and shall submit to testing (including urinalysis and Breathalyzer), as directed by the supervising officer, but no more than six tests per month, in order to confirm continued abstinence from this substance.

Supporting Evidence: Angel Lyons violated the terms of her supervised release in Spokane, Washington, on or about October 19, 2015.

On October 19, 2015, Ms. Lyons failed to appear for random drug testing at Alcohol Drug Education Prevention and Treatment (ADEPT).

5

Special Condition # 19: You shall abstain from the use of illegal controlled substances, and shall submit to urinalysis testing, as directed by the supervising officer, but no more than six tests per month, in order to confirm continued abstinence from these substances.

Supporting Evidence: Angel Lyons violated the terms of her supervised release in Spokane, Washington, on or about October 19, 2015.

On October 19, 2015, Ms. Lyons failed to appear for random drug testing at Alcohol Drug Education Prevention and Treatment (ADEPT).

6

Standard Condition # 2: The defendant shall report to the probation officer in a manner and frequency directed by the court or probation officer.

Supporting Evidence: Angel Lyons violated the terms of her supervised release in Spokane, Washington, on or about October 21, 22, and 26, 2015.

On October 20, 2015, the undersigned officer attempted to contact the offender on her cellular phone, but was not able to leave a message. The undersigned then left a message on her husband's phone directing her to report the next day by 10:00 a.m. Mr. Lyons returned the call and advised he would be with Ms. Lyons that evening, and would give her the message. The offender failed to report on October 21, 2015.

On October 21, 2015, the undersigned officer again attempted to contact the offender on her cellular phone and was still unable to leave a message. Therefore, an additional message was left on Mr. Lyons' phone directing the offender to report on October 22, 2015. Ms. Lyons failed to report on October 22, 2015.

On October 23, 2015, the undersigned officer attempted to contact the offender at her reported residence. Her most recent reported residence is that of her daughter's, and her daughter's boyfriend. The boyfriend answered the door after several knocks. He advised the offender still lived there, and that she had just left to drop her child off at school. I asked the boyfriend to have the offender call me when she returned, and also provided him with

Prob12C

Re: Lyons, Angel N**November 3, 2015****Page 3**

the undersigned's business card to provide to her. The business card included written directives for the offender to report to the probation office on October 26, 2015. Ms. Lyons failed to report on October 26, 2015, and has made no other attempts to make contact.

7

Standard Condition # 6: The defendant shall notify the probation officer at least ten days prior to any change in residence or employment.

Supporting Evidence: Angel Lyons violated the terms of her supervised release in Spokane, Washington, on or about October 14, 2015.

At the time of Ms. Lyons' supervision intake, she reported being self-employed as a dog groomer, and was renting a space at Custom Canine.

On October 28, 2015, the owner of Custom Canine was contacted. She advised that the offender had not reported to work for 2 weeks. She indicated the offender had advised her approximately 2 weeks prior that she would need to secure full-time employment as she was not making enough money to support herself. The owner had not heard from or seen Ms. Lyons since that time.

8

Mandatory Condition # 6: If this judgment imposes a fine or a restitution obligation, it shall be a condition of supervised release that the defendant pay any such fine or restitution that remains unpaid at the commencement of the term of supervised release in accordance with the Schedule of Payments set forth in the Criminal Monetary Penalties sheet of this judgment.

Supporting Evidence: Angel Lyons violated the terms of her supervised release in Spokane, Washington, on or about October 15, 2015.

Ms. Lyons failed to make a payment toward her criminal monetary penalties by October 15, 2015.

The U.S. Probation Office respectfully recommends the Court issue a warrant for the arrest of the offender to answer to the allegations contained in this petition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 11/03/2015

s/Melissa Hanson

Melissa Hanson
U.S. Probation Officer

THE COURT ORDERS

- No Action
- The Issuance of a Warrant
- The Issuance of a Summons



Signature of Judicial Officer

November 3, 2015

Date